

BOULT  
CUMMINGS  
CONNERS  
& BERRY PLC

RECEIVED  
REGULATORY AUTHORITY

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EXECUTIVE SECRETARY  
January 4, 2000

DW received  
Filing Fee 114/2000

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

00-00026

Dear David:

Pursuant to Section 251(f)(1) of the federal Telecommunications Act of 1996, US LEC Corp. hereby notifies the Tennessee Regulatory Authority that US LEC has made a "bona fide request" for interconnection with the four TDS-owned, local exchange carriers in Tennessee. A copy of the request is attached.<sup>1</sup>

This notice to the TRA is intended to trigger the 120-day time period within which the TRA must decide, based on the legal standards described in Section 251(f)(1), whether TDS is required to comply with the interconnection obligations contained in Section 251.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry*  
Henry Walker

HW/nl  
Attachment  
c: T. G. Pappas  
Aaron Cowell

paid \$2500  
CK# 522648

<sup>1</sup> In a previous letter to TDS, dated July 13, 1999, US LEC explained that the company desires to negotiate a single, consolidated interconnection agreement with TDS with separate attachments setting forth rates for the four TDS-owned companies in Tennessee.

00-00026

RECEIVED DEC 13 1999



December 7, 1999

John Monroe  
TDS Telecom  
725 Pellissippi Parkway, Suite 230  
Knoxville, TN 37932

**RE: Request for Interconnection Negotiations Pursuant to Section 251 of the Telecommunications Act of 1996 with TDS Telecom and its Companies in the State of Tennessee**

Dear Mr. Monroe:

The purpose of this letter is to formalize US LEC's request for an interconnection agreement with TDS Telecom and its local exchange operating companies (TDS) in the state of Tennessee. US LEC looks forward to concluding an agreement with TDS addressing the areas of interconnection, access to unbundled elements, resale of telecommunications services, and transport and termination of traffic as contemplated by Sections 251(a) through (c) of the Act. In order to facilitate the discussions between US LEC and TDS, I request that, at a minimum, the topics of negotiation include:

1. Interconnection Arrangements

US LEC and TDS should reach efficient and mutually agreeable interconnection arrangements that include non-discriminatory, real-time access to databases, at cost-based rates pursuant to Section 252(d)(1) of the Act, and associated signaling necessary for call routing and completion.

TDS should also make available to US LEC collocation for equipment necessary for interconnection or access to unbundled network elements as contemplated by Section 251(c)(6) of the Act.



2. Meet-Point Billing Arrangements

US LEC would like to establish meet-point billing arrangements with TDS so that it may offer a common transport option to parties purchasing originating and terminating switched access services from US LEC.

3. Reciprocal Compensation

Compensation for traffic exchanged between the networks of US LEC and TDS should allow for the mutual and reciprocal recovery of costs associated with transport and termination as contemplated by Sections 251(b)(5) and 252(d)(2) of the Act.

4. Access to Ancillary Platforms

US LEC seeks access to all ancillary platform arrangements such as 911/E911, Directory Assistance, Directory Listings and Directory Distribution, Transfer of Service Announcement, Coordinated Repair Calls, and Busy Line Verification and Interrupt.

5. Unbundled Elements

US LEC requests nondiscriminatory access to TDS' network elements on an unbundled basis as contemplated by Section 251(c)(3).

6. Number Portability

Until permanent number portability arrangements are available under Section 251(b)(2), US LEC and TDS should provide interim number portability ("INP") options to each other on a competitively neutral basis, in accordance with the FCC's July, 1996 Number Portability Order.



7. Access to Rights-of-Way

US LEC would like access  
TDS' poles, ducts, conduits, and rights-of-way as needed by US LEC  
to provide local exchange services.

8. Resale of Local Services

TDS should make available to US LEC for resale, at wholesale rates as  
defined in Section 252(d)(3), any telecommunications services  
currently provided at retail to subscribers who are not  
telecommunications carriers.

The suggested topics of negotiations listed above are intended only to  
assist in establishing an initial framework for interconnection negotiations.  
US LEC reserves the right to suggest additional or modified arrangements as  
negotiations proceed.

Basically, US LEC would like to provide local exchange services to  
customers currently located within TDS's traditional serving area.  
Furthermore, we would like to do this in concert with TDS through a fully  
functional interconnection of our respective networks at a mutually agreeable  
point (or points) inside TDS's service boundary in accordance with the terms  
of the Act.

This is a "bona-fide request" for interconnection pursuant to 47 U.S.C.  
251(f)(1)(A). We are therefore providing a copy of the request to the  
Tennessee Regulatory Authority pursuant to Section 251(f)(1)(A).

All notices or other communication following approval of the  
agreement should be sent to: Aaron D. Cowell, Jr.

Executive Vice President, General Counsel  
US LEC Corp.  
Transamerica Square  
401 N. Tryon St., Suite 1000  
Charlotte, NC 28202

John Monroe  
December 7, 1999  
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During the negotiation process I will be the primary contact and may be reached at the following:

(Telephone) 704.319.1176

(Facsimile) 704.319.0069

We thank you in advance for your prompt attention to this matter and look forward to receiving your response so that we can set about the task of completing negotiations on an interconnection agreement in accordance with the terms of the Telecommunications Act of 1996.

Very truly yours,

A handwritten signature in black ink, appearing to read "Cathy J. Quinn", written over a horizontal line.

Cathy J. Quinn  
Manager - Interconnect Agreements

Cc: Aaron D. Cowell, Jr.  
US LEC Corp.

David Waddell  
Tennessee Regulatory Authority

Henry M. Walker, Esq.